

I hold amateur Extra Class radio license KK3K. I was first licensed in 1982. I am currently vice president of the Lambda Amateur Radio Club. I am an ARRL member. I am a member of AMSAT.

I am heartened that the FCC has put forth a proposal for amateur license restructuring. I am also pleased that the FCC has asked for input from the amateur community relative to its proposal. As for my input, I am in very much in favor of including the following two provisions in any proposal that is eventually adopted:

1. Reducing the number of license classes from the current six to three.
2. Reducing the maximum Morse code speed requirement for full HF access to 5 WPM and eventually eliminating it altogether.

These provisions, if adopted, would have the following effects:

1. streamlining amateur licensing and testing
2. rendering amateur testing relevant to current and future technology
3. facilitating the growth of the amateur radio service

Provision 1. Number of License classes.

In my view the FCC's proposal does not go far enough toward streamlining and modernizing amateur radio licensing. The proposed four classes of licenses are simply still too many. I favor the elimination of the following classes: Novice, Tech Plus, and Advanced, while retaining the following classes: Technician, General, and Extra.

Current Novices and Technician Plus licensees should be grandfathered into the General class. Current Advanced class licensees should be grandfathered into the Extra Class.

The Technician class license should become the sole entry class amateur license. It would grant VHF and above privileges and entail a basic written test but no Morse requirement. The General class license would grant full HF privileges and would entail a full written test and a 5 wpm Morse code requirement. The Extra class license would entail a comprehensive written exam and signify superior achievement and comprehensive knowledge of all areas of theory and amateur practice. However, it would not require an additional level of Morse proficiency. Frequency allocations can continue to reflect differences in the license classes in an appropriate fashion as they currently do. Such a scheme, if adopted would simplify U.S. amateur licensing so that it more closely resembles amateur licensing structures in many other countries.

Provision 2. Morse Code Testing at 5 WPM Maximum

I am in favor of the FCC=92s suggestion to replace the Morse code requirement with more relevant written testing on various aspects of current and developing technology. Today, Morse code is merely one of many modes of communication used by amateur radio operators. There is no reason to single it out as particularly significant or important. A single 5 wpm Morse test will also remove the necessity of processing and issuing waivers of higher-speed code tests for the handicapped. Eventually, all Morse testing should be eliminated consistent with our obligations under international treaties.

Summary

I believe that three classes of licenses and one level of code proficiency at 5 WPM, (which would grant full H.F. privileges,) are two essential components of any meaningful restructuring of the amateur radio service.

I urge the FCC to alter its proposal to include a three-tiered license structure and a maximum CW test speed of five words per minute.

Very truly yours,

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